

FILED
Clerk
District Court

JUN - 1 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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8 UNITED STATES DISTRICT COURT

9 NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA) Criminal Case No. 05-00028-001
11 Plaintiff,)
12 v.) GOVERNMENT'S MOTION FOR
13 FRANK N. BAZA,) SUBSTANTIAL ASSISTANCE
14 Defendant.) DEPARTURE UNDER USSG §5K1.1
AND 18 U.S.C. §3553(e)

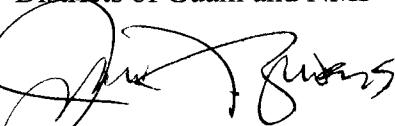
15 Pursuant to Section 5K1.1 of the United States Sentencing Guidelines, and Title
16 18, United States Code, Section 3553(e), the plaintiff, United States of America, hereby moves
17 the Court to depart from the Sentencing Guidelines and the statutory mandatory minimum
18 sentence, based on defendant's substantial assistance to the government.
19

20 The government recommends a 50% departure from guideline-level 29 (range 108-135
months), to a **sentence of 54 months.**

21 Respectfully submitted,
22

23 LEONARDO M. RAPADAS
United States Attorney
24 Districts of Guam and NMI

25 By:
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28 Assistant United States Attorney

